



C-219-98

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193
(703) 583-3800
Fax (703) 583-3801

April 23, 1998

Mr. Ray Sullivan
DC Department of Corrections
Industries Division
P.O. Box 730
Lorton, VA 22079

RE: DC Department of Corrections - Industries Division (DCDC)
VAD980830988

Dear Mr. Sullivan:

As requested in the December 24, 1997, inspection report and subsequently requested in my telephone conversation with you on March 16, 1998, and my conversation with Mr. Robert Wadell, DCDC, on April 16, 1998, please notify the Department of Environmental Quality (DEQ) of the location of your hazardous waste satellite accumulation areas and accumulation/storage areas as required by the VHWMR 9 VAC 20-60-370.E.1.e (§6.4.E.1.e).

Also, please provide information to DEQ regarding the management of the contaminated paint filters generated in the furniture shop.

Please provide a response to DEQ within 10 calendar days of the date of this letter. If you have any questions, please call me at (703) 583-3891.

Sincerely,

A handwritten signature in cursive script that reads "Stacey M. Rosenquist".

Stacey M. Rosenquist
Enforcement/Compliance Specialist Sr.

cc: Claire Ballard
Douglas Washington
Waste Compliance Manager



ACKNOWLEDGEMENT OF NOTIFICATION
OF REGULATED WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

+
VAD980830988

INSTALLATION ADDRESS

D C DEPARTMENT OF CORRECTIONS
PO BOX 730
LORTON , VA 22079
RAYMOND C SULLIVAN INDUST MGR
INDUSTRIAL DIVISION CENTRAL SI
LORTON , VA 22079

Please print or type with TYPE type (12 characters per inch) in the unshaded areas only

Form Approved: OMB No. 2050-0028. Expires 10-31-91
GSA No. 0246-EPA-OT

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 307 of the Resource Conservation and Recovery Act).



EPA

Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

AUG 31 1993

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒

E. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

VAD980830988

II. Name of Installation (Include company and specific site name)

DC DEPT OF CORRECTIONS

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

INDUSTRIAL DIVISION-CENTRAL

Street (continued)

SILVERBROOK RD TOWER GATE 4

City or Town

LORTON

State

VA

ZIP Code

22079-0730

County Code

County Name

FAIRFAX

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

PO BOX 730

City or Town

LORTON

State

VA

ZIP Code

22199-0730

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

SULLIVAN

(first)

RAYMOND C

Job Title

INDUSTRIAL MGR

Phone Number (area code and number)

703-643-6332

VI. Installation Contact Address (See Instructions)

A. Contact Address
Location Mailing

☒☒

B. Street or P.O. Box

SAME

City or Town

State

ZIP Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

DISTRICT OF COLUMBIA GOVT.

Street, P.O. Box, or Route Number

City or Town

State

ZIP Code

Phone Number (area code and number)

B. Land Type

F

C. Owner Type

M

D. Change of Owner
Indicator

Yes

No

(Date Changed)
Month Day Year

ID: For Official Use Only									

VIII. Type of Regulated Waste Activity (Mark X in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity		B. Used Oil Activities	
1. Generator (See instructions)	<input type="checkbox"/>	1. Off-Specification Used Oil Fuel	<input type="checkbox"/>
a. Greater than 1000 kg/mo (2,200 lbs.)	<input checked="" type="checkbox"/>	a. Generator Marketing to Burner	<input type="checkbox"/>
b. 100 to 1000 kg/mo (220 - 2,200 lbs.)	<input type="checkbox"/>	b. Other Marketer	<input type="checkbox"/>
c. Less than 100 kg/mo (220 lbs.)	<input type="checkbox"/>	c. Burner, indicate device(s)	<input type="checkbox"/>
2. Transporter (Indicate Mode in boxes 4-5 below)	<input type="checkbox"/>	Type of Combustion Device	<input type="checkbox"/>
a. For own waste only	<input type="checkbox"/>	1. Utility Boiler	<input type="checkbox"/>
b. For commercial purposes	<input type="checkbox"/>	2. Industrial Boiler	<input type="checkbox"/>
Mode of Transportation	<input type="checkbox"/>	3. Industrial Furnace	<input type="checkbox"/>
1. Air	<input type="checkbox"/>	2. Specification Used Oil Fuel Marketer	<input type="checkbox"/>
2. Rail	<input type="checkbox"/>	or On-Site Burner Who First Claims	<input type="checkbox"/>
3. Highway	<input type="checkbox"/>	the Oil Meets the Specification	<input type="checkbox"/>
4. Water	<input type="checkbox"/>		
5. Other - specify	<input type="checkbox"/>		

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark X in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR parts 261.20 - 261.24)									
1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (D000)	(List specific EPA hazardous waste number(s) for the toxicity characteristic contaminant(s))					
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>						
B. Listed Hazardous Wastes. (See 40 CFR 261.31-33. See instructions if you need to list more than 12 waste codes)									
1	2	3	4	5	6	7	8	9	10
F002	F003	F005							
C. Other Wastes. (State of other wastes requiring an LD number. See instructions)									
1	2	3	4	5	6				

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature

Name and Official Title (type or print)

Dr. W. Brown, Jr., Asst. Director


Date Signed

08/17/92

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

Form Approved OMB No. 156-573016
GSA No. 0246-EPA-OT

 U.S. ENVIRONMENTAL PROTECTION AGENCY NOTIFICATION OF HAZARDOUS WASTE ACTIVITY	
I. INSTALLATION'S EPA I.D. NO.	
II. NAME OF INSTALLATION	
III. INSTALLATION MAILING ADDRESS	
IV. LOCATION OF INSTALLATION	

PLEASE PLACE LABEL IN THIS SPACE

RECEIVED

Facilities Management Section

FEB 6 1984

INSTRUCTIONS: If you received a prefill label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a prefill label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. Information requested herein is required by 40 CFR 263.10(a)(1)(ii).

FOR OFFICIAL USE ONLY

U.S. COMMENTS

[illegible]

INSTALLATION'S EPA ID NUMBER										APPROVED		DATE RECEIVED (yr. mo. day)									
S	F	V	A	D	9	8	0	8	3	0	9	8	8			8	4	0	2	0	7

1. NAME OF INSTALLATION

DC DEPARTMENT OF CORRECTIONS

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 INDUSTRIAL DIVISION PO BOX 18

CITY OR TOWN

ST. | ZIP CODE

L	O	R	T	O	N
---	---	---	---	---	---

U	A	2	2	0	7
---	---	---	---	---	---

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

SAME AS ABOVE

CITY OR TOWN

ST. | ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

STRICKLAND MARION ASST. DIR. 703 643 2142

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 D C G O V E R N M E N T

3. TYPE OF COVER: (P)
ENTER THE APPROPRIATE NUMBER IN BOX

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate boxes).

F = FEDERAL
M = NON-FEDERAL

☒ A. GENERATION

3. TRANSPORTATION (complete item VII)

☐ C. TREAT/STORE/DISPOSE

☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate boxes)

☐ A. AIR

3. RAIL

[] C. HIGHWAY

☐ D. WATER

☐ 3. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

C. INSTALLATION'S EPA I.D. N.

☒ A. FIRST NOTIFICATION

5. SUCCESSFUL IDENTIFICATION OF THE C...

IX. DESCRIPTION OF HAZARDOUS WASTES

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from ~~XXXX~~ Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 2 23 - 24	2 23 - 24	3 23 - 24	4 23 - 24	5 23 - 24	6 23 - 24
7 23 - 24	8 23 - 24	9 23 - 24	10 23 - 24	11 23 - 24	12 23 - 24

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from ~~XXXX~~ Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary. N/A

13 23 - 24	14 23 - 24	15 23 - 24	16 23 - 24	17 23 - 24	18 23 - 24
19 23 - 24	20 23 - 24	21 23 - 24	22 23 - 24	23 23 - 24	24 23 - 24
25 23 - 24	26 23 - 24	27 23 - 24	28 23 - 24	29 23 - 24	30 23 - 24

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from ~~XXXX~~ Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary. N/A

31 23 - 24	32 23 - 24	33 23 - 24	34 23 - 24	35 23 - 24	36 23 - 24
37 23 - 24	38 23 - 24	39 23 - 24	40 23 - 24	41 23 - 24	42 23 - 24
43 23 - 24	44 23 - 24	45 23 - 24	46 23 - 24	47 23 - 24	48 23 - 24

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from ~~XXXX~~ Part 261.34 for each listed hazardous waste from hospital, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary. N/A

49 23 - 24	50 23 - 24	51 23 - 24	52 23 - 24	53 23 - 24	54 23 - 24
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See ~~XXXX~~ Parts 261.21 - 261.24.) N/A

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

Marion D. Strickland

Marion D. Strickland, Assistant Dir.

1-26-84

MATERIAL SAFETY DATA SHEET

NPCA

FOR COATINGS, RESINS AND RELATED MATERIALS

(Approved by U.S. Department of Labor "Essentially Similar" to Form OSHA-20)

DATE OF PREP

SECTION I

MANUFACTURER'S NAME STRIPPING PRODUCTS, INC.		EMERGENCY TELEPHONE NO. (203) 743-3263
ADDRESS (Number, Street, City, State, and ZIP Code) 1115 Fowler Street, Old Hickory, TN 37138		
CHEMICAL NAME AND SYNONYMS		TRADE NAME AND SYNONYMS Paint & Varnish Remover,
CHEMICAL FAMILY	FORMULA S.P.I. # 1.	

SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS Mixture:	90		FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES Activator &	10		OTHERS		
OTHERS Evaporation Retarders					
HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES				%	TLV (Units)
Methylene chloride,				70	500
Methyl Alcohol,				20	200

SECTION III - PHYSICAL DATA

BOILING POINT (°F.) (Range)	104 - 149°F	SPECIFIC GRAVITY (H ₂ O=1)	
VAPOR PRESSURE (mm Hg.)	280	PERCENT VOLATILE BY VOLUME (%)	
VAPOR DENSITY (AIR=1)	2.55	EVAPORATION RATE (_____=1)	
SOLUBILITY IN WATER	partly miscible, (emulsifies).		
APPEARANCE AND ODOR	Amber colored liquid, /aromatic odor.		

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used)	FLAMMABLE LIMITS	LeI	HeI
none to boiling point. (T.C.C./T.O.C.)	not determined		
EXTINGUISHING MEDIA			
use A.B.C. type extinguisher; Foam type; Dry Chemical; /Carbon dioxide.			
SPECIAL FIRE FIGHTING PROCEDURES			
Fire fighting personell should use self-contained respirators while fighting fires in buildings where Varnish-Remover is stored.			
UNUSUAL FIRE AND EXPLOSION HAZARDS			
Contains chlorinated solvent. Lay from flammable vapor-air mixture at above ambient temperature. Do not cut drums with welding torches.			

SECTION V - HEALTH HAZARD DATA	
THRESHOLD LIMIT VALUE	see section II
EFFECTS OF OVEREXPOSURE	Inhalation of high vapor concentrations may have results ranging from dizziness and headaches to unconsciousness.
EMERGENCY AND FIRST AID PROCEDURES	Eyes: flush with large amount of water. Get medical attention if irritate Inhalation: remove patient to fresh air. If breathing difficulties develop give artificial respiration/oxygen. Get medical attention. Skin: wash and flush with plenty of water.

SECTION VI - REACTIVITY DATA			
STABILITY	UNSTABLE		CONDITIONS TO AVOID
	STABLE	V	open flames and welding arcs can cause
INCOMPATIBILITY (Materials to avoid) thermal degradation with the evolution of Hydrogen Chloride and very			
HAZARDOUS DECOMPOSITION PRODUCTS small amounts of Phosgene and Chlorine.			
HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID
	WILL NOT OCCUR	V	

SECTION VII - SPILL OR LEAK PROCEDURES	
STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED provide adequate ventilation, cover spills with absorptive materials. (sand; sweeping compound). Place into covered metal containers.	
WASTE DISPOSAL METHOD Dispose of remover wastes in accordance with local, state, and or Federal regulations. If in doubt, contact local authorities or state EPA office.	

SECTION VIII - SPECIAL PROTECTION INFORMATION		
RESPIRATORY PROTECTION (Specify type) not to be used if adequate ventilation is provided.		
VENTILATION	LOCAL EXHAUST Recommended industrial floor-level with tank/tank-tray hook-up MECHANICAL (General)	SPECIAL OTHER
PROTECTIVE GLOVES Viton, Neoprene or similar.	EYE PROTECTION Splash-proof goggles.	
OTHER PROTECTIVE EQUIPMENT neoprene or rubber aprons, Arm protection, boots.		

SECTION IX - SPECIAL PRECAUTIONS	
PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING Store in cool area; do not expose containers, (drums) to sunlight.	
When opening drum, open bung part way and vent any accumulated pressure before removing the bung. In cold weather, when heating is required: remove both(2) bungs before applying safety heating unit-electric	



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

VAD 98 083 0988
Marion Strickland, Asst Dir
DC Dept of Corrections
Industrial Division PO Box 18
Lorton, VA 22079

INSTALLATION ADDRESS

Industrial Division PO Box 18
Lorton, VA 22079



ACKNOWLEDGEMENT OF NOTIFICATION
OF REGULATED WASTE ACTIVITY
(VERIFICATION)

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EPA I.D. NUMBER

+
VAD981040728

INSTALLATION ADDRESS

FOUR SEASONS CLEANERS INC
121 SO 15TH AVE
HOPEWELL, VA 23860
RAMON HILL MGR

121 SO 15TH AVE
HOPEWELL, VA 23860

EPA Form 8700-12B (6-90)

Shirley Belkin

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
OFFICE OF THE DIRECTOR



March 22, 1984

D.C. Department of Corrections
Industrial Division
P.O. Box 18
Lorton, Virginia 22079
Attn: Mr. Marion Strickland

Dear Mr. Strickland:

On January 26, 1984, the D.C. Department of Corrections requested a District/EPA installation identification number through the Department of Environmental Services as a generator of hazardous waste.

Since the location of the installation is in the state of Virginia, we have been informed by Mr. Peter Schaul, RCRA Enforcement Section, EPA Region III, that the facility will be issued a Virginia/EPA installation identification number. As such, the facility is required to comply with Virginia's regulations pertaining to hazardous waste management. Future inquiries should be addressed to:

Virginia Department of Health
Bureau of Hazardous Waste Management
109 Governor Street
Richmond, Virginia 23219
(804) 225-2975
Attn: Mr. Walter Gulevich

We regret any inconvenience you have incurred with respect to this action.

Sincerely,

A handwritten signature in dark ink, appearing to read "Angelo C. Tompros".

Angelo C. Tompros, Acting Chief
Bureau of Pesticides & Hazardous
Waste Management

cc: Virginia Department of Health
EPA Region III

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF ENVIRONMENTAL SERVICES

ADDRESS REPLY TO
OFFICE OF ENVIRONMENTAL
STANDARDS AND QUALITY ASSURANCE
5010 OVERLOOK AVENUE, S.W.
WASHINGTON, D. C. 20032-5397



February 1, 1984

Ms. Shirley Bulkin
U.S. EPA Region III
Facility Waste Management Section
6th & Walnut Streets
Philadelphia, Pa 19106
3ES11

Dear Ms. Bulkin:

Enclosed is a completed notification form from the D.C. Department of Corrections. A preliminary inspection has been conducted at this facility to assure that they actually need an EPA Identification Number.

Please process this application and notify us accordingly. We shall then forward this information to the facility.

Thank you.

Sincerely,

Angelo Tompros

Angelo Tompros, Chief
Bureau of Pesticides &
Hazardous Waste Management

Enclosure

RECEIVED
Facilities Management Section

FEB 6 1984

U.S. EPA, Region III

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 10-31-91
GSA No. 0746-EPA-OT

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



EPA

Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

AUG 24 1992
AUG 31 1993

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒

E. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

VAD981040728

II. Name of Installation (Include company and specific site name)

FOUR SEASONS CLEANERS INC

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

121 SO 15TH AVE

Street (continued)

City or Town

HOPEWELL

State

ZIP Code

VA 23860-

County Code

County Name

KING GEORGE

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

SAME

City or Town

State

ZIP Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

HILL

(first)

RAMON

Job Title

MANAGER

Phone Number (area code and number)

804-458-0032

VI. Installation Contact Address (See Instructions)

A. Contact Address
Location Mailing

☒

B. Street or P.O. Box

City or Town

State

ZIP Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

FOUR SEASONS CLEANERS INC

Street, P.O. Box, or Route Number

121 SO 15TH AVE

City or Town

State

ZIP Code

HOPEWELL

VA 23860-

Phone Number (area code and number)

804-458-0032

B. Land Type

☐

C. Owner Type

☐

D. Change of Owner
Indicator

Yes

No

(Date Changed)

Month

Day

Year

7 1 91

[illegible]

A: Hazardous Waste Activity		B: Used Oil/Fuel Activities	
<input type="checkbox"/> 1. Generator (See Instructions) <input type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.) <input type="checkbox"/> b. 100 to 1000 kg/mo (220 - 2,200 lbs.) <input checked="" type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)	<input type="checkbox"/> 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.	<input type="checkbox"/> 1. Off-Specification Used Oil/Fuel <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketer <input type="checkbox"/> c. Burner - Indicate device(s)	<input type="checkbox"/> 1. Off-Specification Used Oil/Fuel <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketer <input type="checkbox"/> c. Burner - Indicate device(s)
<input type="checkbox"/> 2. Transporter (Indicate Mode in boxes 1-5 below) <input type="checkbox"/> a. For own waste only <input type="checkbox"/> b. For commercial purposes	<input type="checkbox"/> 4. Hazardous Waste Fuel <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketers <input type="checkbox"/> c. Burner - Indicate device(s)	<input type="checkbox"/> Type of Combustion Device <input type="checkbox"/> 1. Utility Boiler <input type="checkbox"/> 2. Industrial Boiler <input type="checkbox"/> 3. Industrial Furnace	<input type="checkbox"/> Type of Combustion Device <input type="checkbox"/> 1. Utility Boiler <input type="checkbox"/> 2. Industrial Boiler <input type="checkbox"/> 3. Industrial Furnace
<input type="checkbox"/> Mode of Transportation <input type="checkbox"/> 1. Air <input type="checkbox"/> 2. Rail <input type="checkbox"/> 3. Highway <input type="checkbox"/> 4. Water <input type="checkbox"/> 5. Other - specify	<input type="checkbox"/> Type of Combustion Device <input type="checkbox"/> 1. Utility Boiler <input type="checkbox"/> 2. Industrial Boiler <input type="checkbox"/> 3. Industrial Furnace	<input type="checkbox"/> 2. Specification Used Oil/Fuel Marketer (or On-site Burner Who First Claims the Oil Meets the Specification)	<input type="checkbox"/> 2. Specification Used Oil/Fuel Marketer (or On-site Burner Who First Claims the Oil Meets the Specification)
	<input type="checkbox"/> 5. Underground Injection Control		

A. Characteristics of Nonlisted Hazardous Wastes. Mark "X" in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)


Characteristic (D001)	Corrosive (D002)	Reactive (D003)	Toxicity Characteristic (D000)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F002

(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))

1	2	3	4	5	6
7	8	9	10	11	12

[illegible]

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature 	Name and Official Title (type or print) Ramon G. H. '11 Mex.	Date Signed 8/20/92
--	---	------------------------

Name and Official Title (type or print)	Date Signed
Ramon G. Hill Mgr.	8/20/92

Date Signed 8/20/92

The facilities remains the same but - name & ownership have changed as of 7/1/91 Formerly VA. Serv. Inds. Inc. Only ~~that~~ had 900 lbs waste in 1991

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



C-728-97

COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
Governor

Becky Norton Dunlop
Secretary of Natural Resources

Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193
(703) 583-3800
Fax (703) 583-3801

Thomas L. Hopkins
Director

Gregory L. Clayton
Regional Director

December 24, 1997

Mr. Ray Sullivan
DC Department of Corrections
Industries Division
P.O. Box 730
Lorton, VA 22079

RE: RCRA Inspection - Notice of Violation
DC Department of Corrections - Industries Division
VAD980830988

Dear Mr. Sullivan:

Thank you for your cooperation during the compliance evaluation inspection conducted at your facility on December 5, 1997, by the Virginia Department of Environmental Quality (DEQ), Northern Virginia Regional Office (NVRO). During this inspection, NVRO evaluated the facility for compliance with the Virginia Hazardous Waste Management Regulations (VHWMR) as a Large Quantity Generator. I have enclosed a completed summary sheet and inspection checklists for your review.

Also, during the inspection, NVRO re-evaluated the facility for compliance with the VHWMR regarding outstanding violations noted during the December 12, 1996, inspection. As a result of this inspection, your facility has been returned to compliance with the VHWMR for the violations listed below:

1. The owner/operator does not maintain the following documents or records at the facility as required by the VHWMR §9.1.G.4:
 - a. Job titles for each position at the facility related to hazardous waste management(VHWMR §9.1.G.4.a.),
 - b. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position (VHWMR §9.1.G.4.c).

The following violations remain unresolved and are subject to continued enforcement action:

1. Facility personnel have not successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures as required by the VHWMR §6.4.E.1.d. and §9.1.G.1.
2. New employees to the facility have not successfully completed training mentioned above within six months of their employment or assignment to the facility as required by the VHWMR §9.1.G.2. ✓
3. Facility personnel do not participate in an annual review of the initial training as required by the VHWMR §9.1.G.3. ✓
4. The owner/operator does not maintain the following documents or records at the facility as required by the VHWMR §9.1.G.4: ✓
 - a. Name of employee filling each job (VHWMR §9.1.G.4.a),
 - b. A written job description for each position (VHWMR §9.1.G.4.b.), and
 - c. Records that document that the training or job experience required above has been given to, and completed by facility personnel (VHWMR §9.1.G.4.d.).

Based on review of observations, responses, and documents obtained during this inspection, the Department has information indicating that the facility may be in violation of another applicable provision of the VHWMR. This information is noted on the enclosed inspection checklist and summarized below:

- ✓ 1. The generator failed to determine that the transporter has a valid EPA ID number and a valid Virginia Transporter Permit as required by the VHWMR §5.5.A.7.

These issues were discussed with you during the inspection and are explained on your checklist. Please advise this office within 10 calendar days if this information is incorrect, if you have taken appropriate action to address these issues, or if there is other information that DEQ should consider.

As we discussed during the inspection, due to additional changes to DCDC's Training Plan, please submit to DEQ for review a copy of the revised Training Plan. Also, as a result of this inspection, please notify DEQ of your hazardous waste satellite areas and storage areas as required by the VHWMR §6.4.E.1.e. ✓

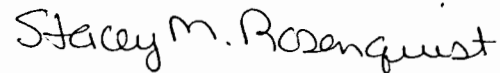
This notice is not an agency proceeding or determination which may be considered a case decision under the Administrative Process Act (Va. Code §§ 9-6.14:1, et seq.).

Mr. Sullivan
RCRA Inspection
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Please take appropriate action to address all issues noted above and provide documentation of your actions to DEQ within 15 calendar days of the date of this letter.

Again, thank you for your cooperation during the inspection. If you have any questions, please call me at (703) 583-3891.

Sincerely,

A handwritten signature in cursive script that reads "Stacey M. Rosenquist".

Stacey M. Rosenquist
Enforcement/Compliance Specialist Sr.

Enclosures

cc: Claire Ballard
John Ely
Douglas Washington

January 1994

**DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION**

**SURVEY SHEET
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES**

NAME of FACILITY: DC Department of Corrections - Industries Division

ADDRESS: Industries Division-Central
Silverbrook Road Tower Gate 4
Lorton, VA 22079-0730

EPA ID NUMBER: VAD980830988

**FACILITY
REPRESENTATIVE:** Raymond Sullivan

TITLE: Industrial Manager

TELEPHONE NUMBER: (703) 643-6332

INSPECTOR'S NAME: Stacey M. Rosenquist
Douglas Washington

TITLE: Enforcement\Compliance Specialist Sr.
Enforcement\Compliance Specialist

DATE of INSPECTION: December 5, 1997

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.)

Furniture repair and refinishing

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

D001/F002 - Waste methylene chloride (sludge and sponges/ppe)

D001/D035/F003/F005 - Waste paint related material (paint and paint filters)

3. List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
D001, F002	2 drums (55 gallon)	7 drums (55 gallon)
D001, D035, F003, F005	3 drums (55 gallons)	4 drums (55 gallon)

4. Does the facility ever generate greater than:
1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)?

NO

100 kg of clean-up from a spill of P listed waste or F020-F023 and F026-F027 waste?

NO

If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent?
(List all transporters and facilities, or on-site treatment performed).

Transporters-

Freehold Cartage NJD054126164

Metropolitan Env. INT190010397

TSD Facilities-

Petrochem Processing Inc. MID980615298

North East Chemcial Corporation OHD980681571

6. Does the facility generate any hazardous waste that is excluded from regulation?

NO

If yes, list the waste and the basis for exclusion.

7. Does the facility:

Generate

Market

Burn

used oil that is burned for energy recovery? **Underline or circle all that are applicable.**(If the facility **markets** or burns used oil, fill out the **Used Oil Checklist**.)

NO

Does the generator of used oil to be burned for energy recovery (other than a **Conditionally Exempt Small Quantity Generator**) mix the used oil with hazardous waste?

NO

If YES, then fill out the **Used Oil Checklist**.

8. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these?

NO

If Yes, list the waste, where it is sent, and complete the **Metals Recovery Checklist**.

9. Does the facility generate, transport, store, collect or reclaim spent lead-acid batteries?

NO

If yes, Underline or circle all that are applicable. If the facility stores batteries before reclaiming them, complete the **Metals Recovery Checklist**.

10. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
- b. small quantity generator
- c. generator
- d. permitted or interim status TSD
- e. unpermitted TSD (explain in comments section)
- f. transporter
- g. other: please explain _____

[Underline or Circle All That Are Applicable]

11. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5-55-gallon drums) of non-acute hazardous waste, at which time the accumulation time (180 days or 270 days) for small quantity generators begin.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

12. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]

Location	# of Containers	# of Tanks	Capacity
Storage Area D001/F002	6 drums	0	55 gallons each
Storage Area D001/D035/F003/F005	1 drum	0	55 gallons
Satellite 1 D001/D035/F003/F005 Metal Shop	1 can	0	5 gallons
Satellite 2 D001/D035/F003/F005 Furniture Shop	1 drum	0	55 gallons
Satellite 3 F002 (sponges and PPE) Furniture Shop	1 drum	0	55 gallons
Satellite 3 D001/F002 (sludge) Furniture Shop	1 drum	0	55 gallons

13. Comments:

See Checklists.

14. Waste Management Flow Diagram:

(On this page sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

N/A

January 1994

**DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION**

**CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF
LARGE QUANTITY GENERATORS (LQG)**

FACILITY NAME: DC Department of Corrections - Industries Division

EPA ID NUMBER: VAD980830988

INSPECTION DATE: December 5, 1997

NOTE: * means Non-Compliance

VIRGINIA HAZARDOUS WASTE MANAGEMENT REGULATIONS

PART/ SECTION	REGULATION	YES	NO	N/A
6.3.	1. Is a manifest system currently being used for all hazardous waste shipped off site?	X		
6.2.C.	2. Has the generator determined that the facility has an EPA ID number?	X		
5.5.A.7.	3. Has the generator determined that the transporter has a valid EPA ID number and a valid Virginia Transporter permit?		* ✓	
6.3. 5.3.B.	4. Is the following information on the manifest:			
5.3.B.1.	A. The generator's name, mailing address, EPA ID number, and telephone number?	X		
5.3.B.2.	B. A unique five digit number assigned to the manifest by the generator?	X		
5.3.B.3.	C. The total number of pages of the manifest?	X		
5.3.B.4.	D. The company name and EPA ID number of each transporter used?	X		
5.3.B.5.	E. The company name, site address, and EPA ID number of the facility designated to receive the waste?	X		
5.3.B.6.	F. The U.S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material?	X		
5.3.B.7.	G. The quantities of waste being shipped? and	X		

PART/ SECTION	REGULATION	YES	NO	N/A
5.3.C.	H. The following certification: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment. OR, If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.	X		
6.5.C.1.b.	5. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago? SEE COMMENTS	X		
6.5.C.1.b.	6. If no, has the generator filed an exception report with the Executive Director?			X
6.5.C.1.b.	7. Does the exception report include:			
6.5.C.1.b.(1)	A. A legible copy of the manifest for which the generator does not have confirmation of the delivery? and			X
6.5.C.1.b.(2)	B. A cover letter explaining the efforts taken to locate the shipment?			X
6.4.E.1.d. 9.1.G.1.	8. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?		* ✓	
9.1.G.2.	9. Have new employees to the facility successfully completed training mentioned above within six months of their employment or assignment to the facility?		* ✓	
9.1.G.3.	10. Do personnel participate in an annual review of the initial training?		* ✓	
9.1.G.4.	11. Does the owner/operator maintain the following documents and records at the facility:			
9.1.G.4.a.	A. Job titles for each position at the facility related to hazardous waste management?	X		
9.1.G.4.a.	B. The name of the employee filling each job?		* ✓	
9.1.G.4.b.	C. A written job description for each position in 11.A. above?		* ✓	
9.1.G.4.c.	D. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in 11.A. above? and,	X		
9.1.G.4.d.	E. Records that document that the training or job experience required above has been given to, and completed by facility personnel?		* ✓	
6.4.E.1.d. 9.2.B. 9.2.D.	12. At the facility, is the following equipment installed:			

PART/ SECTION	REGULATION	YES	NO	N/A
9.2.B.1.	A. An internal communications or alarm system capable of providing immediate emergency instruction to facility personnel if the hazardous waste generation or accumulation areas are threatened by hazardous waste release, fire or explosion?	X		
9.2.B.2.	B. A device (at the scene of hazardous waste generator operations) capable of summoning emergency assistance from Police, Fire Departments, etc.?	X		
9.2.B.3.	C. Portable fire extinguishers, fire control equipment and decontamination equipment? and	X		
9.2.B.4.	D. Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system?	X		
9.2.C.	13. Is the above equipment tested and maintained as necessary to assure proper operation and is a record of the tests and inspections maintained on a log at the facility?	X		
9.2.E.	14. Does the facility have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies?	X		
6.4.E.1.d. 9.1.F.4.	15. Does the generator record inspections of the accumulation area at his facility in an inspection log?	X		
9.2.F.1.	16. Has the facility attempted to arrange agreements with the local authorities such that:			
9.2.F.1.a.	A. The police, fire and emergency response teams are familiar with the layout of the site, the properties of the hazardous waste handled at the site, normal working areas, entrances to roads inside the facility and possible evacuation routes?	X		
9.2.F.1.b.	B. Where more than one police and fire department might respond to an emergency, do agreements specify a primary emergency authority?	X		
9.2.F.1.c.	C. Agreements with Commonwealth emergency response teams, emergency response contractors and equipment suppliers are specified? and	X		
9.2.F.1.d.	D. The local hospital is familiar with the properties of the hazardous wastes handled and the types of injuries or illnesses which could result from fires, explosions, or releases?	X		
6.4.E.1.d. 9.3.A.1.	17. Does the facility have an established contingency plan to deal with any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, ground water or surface water?	X		
9.3.B.	18. Does the contingency plan contain the following elements:			
9.3.B.(1, 2)	A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, and water?	X		

PART/ SECTION	REGULATION	YES	NO	N/A
9.3.B.3.	B. A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors and Commonwealth and local emergency response teams to coordinate emergency services, as required?	X		
9.3.B.4.	C. A listing of names, addresses, and office and home phone numbers of all persons qualified to act as emergency coordinator? List primary Coordinator. NAME: <u>Donald Ray / Hank Stump</u> TITLE: <u>(Furniture Repair Shop / Metal Fabrication Shop)</u> <u>Shop Managers</u> PHONE:Home <u>(Confidential Listing)</u> Office <u>(703) 643-6557/ (703) 643-6898</u>	X		
9.3.B.5.	D. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? Does this list of emergency equipment specify the location and physical description of each item on the list and a brief outline of its capabilities?	X		
9.3.B.6.	E. An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? and	X		
9.3.C.2.	F. Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? *** PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS".	X		
9.3.F.	19. Has the contingency plan ever been implemented?		X	
9.3.F.(9, 10)	20. If yes, was a written report filed with the Director within 15 days and were the Director and other required authorities properly notified before operations resumed?			X
6.5.A.1.,2., & 3.	21. Does the generator retain copies of all manifests, annual reports, exception reports, test results, and waste analysis for at least three years?	X		
6.5.B.1.	22. Has the facility submitted an annual report for the preceding calendar year by March 1?	X		
6.4.E.7.	23. Does the generator who manages HW prohibited under Part XV treat waste in tanks and containers? If yes, must meet requirements of 6.4.E. and 15.1.G.1.d.		X	
15.1.G.1.d.	24. If the generator treats waste in tanks or containers, has the generator developed a written waste analysis plan and kept on-site in the generator's records. Has the generator filed a plan with director at least 30 days prior to treatment.			X
6.5.D.	25. Has the generator ever submitted a release report if responsible for release of HW which threatens public health. (Must notify NRC, local Government, the Department.)			X
6.4.E.2.	26. Does the generator accumulate (store) hazardous waste in containers or tanks on-site for greater than 90 days? If yes, interim status or a TSD permit is required. (Up to a 30 day extension may be granted by the Director.)		X	

PART/ SECTION	REGULATION	YES	NO	N/A
6.4.E.1.e.	27. Has the generator notified the Executive Director by March 1, 1988, of the exact location of the existing container and tank accumulation areas, and at least 15 days prior to use for subsequently established accumulation areas? SEE COMMENTS	X		
6.4.E.1.a.(1) 9.8.	28. The Use and Management of Containers for 90 Day Accumulation Areas:			
6.4.E.1.a 9.8.B.	29. Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation? If No, list the accumulation areas where there are problems and the type of problems. *** PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS".	X		
6.4.E.1.a. 9.8.C.	30. Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?	X		
6.4.E.1.b.	31. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container?	X		
6.4.E.1.c.	32. Is the container labeled or marked clearly with the words "Hazardous Waste".	X		
9.8.D.1.	33. Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste? If No, list the locations where open containers are found. *** PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS."	X		
9.8.E.	34. Are the areas where hazardous waste containers are stored inspected by the owner/operator at least weekly?	X		
9.8.F.	35. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line?	X		
9.8.G.1.	36. Are incompatible wastes placed in separate containers?	X		
9.8.G.3.	37. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices?	X		
6.4.E.3.a.	38. Does the generator have satellite accumulation areas where up to 55 gal of any one type of HW (1 QT acutely HW) are accumulated? If yes,	X		
6.4.E.3.a.	A. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?	X		
6.4.E.3.a.(1) 9.8.B.	B. Are the containers in good condition?	X		
6.4.E.3.a.(1) 9.8.C.	C. Are the containers compatible with the waste?	X		
6.4.E.3.a.(1) 9.8.D.1.	D. Are the containers kept closed except as necessary to add or remove waste?	X		
6.4.E.3.a.(2)	E. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container? and	X		

PART/ SECTION	REGULATION	YES	NO	N/A
6.4.E.3.b.	F. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,		X	
6.4.E.3.b.	1) Has the generator marked the excess amount with the date the excess amount began accumulating?			X
6.4.E.3.b.	2) Has the generator either removed the excess amount within three days of the date of excess accumulations or has he complied with all other provisions for accumulation areas? Namely, has he notified the Executive Director about the location of the accumulation area?			X
	39. PLEASE LIST ANY NEWLY REGULATED WASTE THAT IS NOT LAND RESTRICTED (such as D018-D043, F032, F034 or F035) ON THE LAST PAGE UNDER "COMMENTS".			
15.1.A.2.	40. Does the facility generate, transport, treat, store or dispose any land-restricted wastes? (See VHWMR Part 15) ***	X		
15.1.A.3.	41. Is land disposal of wastes occurring? If yes,		X	
15.1.A.3.a.	A. Has the facility been granted an extension to the effective date for land restriction applicable to its restricted waste? OR			X
15.1.A.3.b.	B. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? OR			X
15.1.A.3.c.	C. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?			X
15.1.E.	42. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction?		X	
15.1.F.	43. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?		X	
15.1.C.1.	44. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?		X	
15.1.D.1.	45. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)		X	
	46. If yes, does the facility meet the following requirements:			
15.1.D.1.b. 15.1.G. 15.3.C. 15.4. 15.3.	A. Are the residues of the treatment analyzed as specified in VHWMR § 15.1.G. or § 15.3.C. to determine if they meet the applicable treatment standards or VHWMR § 15.4. or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR § 15.3?			X

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.D.1.c. 9.10.B.1. 10.10.B.3.	B. Has the owner/operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liner?			X
15.1.D.1.c. 10.5.	C. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR § 10.5?			X
15.1.D.1.d.	D. Has the owner/operator submitted a written certification to the Executive Director that the requirements of 15.1.D.1.c. have been met which states: "I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted wastes. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment." and			X
15.1.D.1.d.	E. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification?			X
15.1.G.1.a.	47. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?	X		
	48. Did the notification include the following information:			
15.1.G.1.a.(1)	A. EPA Hazardous Waste Number?	X		
15.1.G.1.a.(2)	B. The corresponding treatment standards and all applicable prohibitions set forth in VHWMR § 15.3.C.?	X		
15.1.G.1.a.(3)	C. The manifest number associated with the shipment of waste? and	X		
15.1.G.1.a.(4)	D. Waste analysis data, where available?	X		
15.1.G.1.b.	49. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR § 15.3.C.?			X
	50. Did the notification include the following information:			
15.1.G.1.b.(1) (a)	A. EPA Hazardous Waste Number?			X
15.1.G.1.b.(1) (b)	B. The corresponding treatment standards and all applicable prohibitions?			X
15.1.G.1.b.(1) (c)	C. The manifest number associated with the shipment of waste? and			X
15.1.G.1.b.(1) (d)	D. Waste analysis date, where available?			X

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.G.1.b.2.	51. Was the certification signed by an authorized representative, and did it state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR § 15.4. and all applicable prohibitions set forth in VHWMR § 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."			X
15.1.G.1.c.	52. Has the generator received a case-by-case exemption on restricted waste, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?			X
15.1.G.1.g.	53. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal? SEE COMMENTS	X		
15.5.	54. Is the generator storing land restricted waste? (For one year storage only)		X	
15.5.1.a.	55. If yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?			X

Comments:

3. The generator did not determine that the transporter (3M Private Carriage, MND006173082) has a valid Virginia Transporter permit (manifest# 38418).

8. - 11. At the time of the inspection, the facility was unable to provide documentation to show that personnel have received training. On December 18, 1997, DEQ received DCDC's December 17, 1997, letter and attachments addressing the hazardous waste training given to the shop supervisors on December 17, 1997. The inmate employees have not received any hazardous waste training.

11.B. The training plan/outline does not include the name of the inmate employees filling each job.

11.C. The job description for the inmate employees does not address hazardous waste activities.

11.E. DCDC conducted hazardous waste training for the shop supervisors on December 17, 1997, however, the inmate employees have not received any training.

18.F. DC Fire Department, Fairfax County Fire Department, DC Metropolitan Police Department, Fairfax County Police Department, Fairfax County Hazardous Materials Unit #34, DC General Hospital, Fort Belvoir Army Medical Hospital, Fairfax County Joint Local Emergency Planning Committee (LEPC), DCDC Fire Marshall, DCDC Environmental Control Officer, DCDC Facility Administer, DCDC Central Switchboard, DCDC Chief Medical Officer, DCDC Director's Office, DCDC Industrial Division's Shop Managers, DCDC Associate Director's Office, DCDC Transport Unit, Virginia Department of Environmental Quality (NVRO)

27. The generator should notify DEQ of the location of the satellite accumulation areas and the less than 90 day storage/accumulation area.

39. None

40. D001, D035, F002, F003, F005

53. At the time of the inspection, DCDC was missing one Land Disposal Restriction (LDR) Notification for manifest# 38418. DCDC has obtained a copy of the LDR for that manifest from the TSD facility.

October 1997

DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF
SUBPART CC FACILITIES (CC)

FACILITY NAME: DC Department of Corrections - Industries Division

EPA ID NUMBER: VAD980830988

INSPECTION DATE: December 5, 1997

NOTE: * means Non-Compliance.

CODE OF FEDERAL REGULATIONS

PART/ SECTION	REGULATION	YES	NO	N/A
40CFR265	GENERAL			
265.1080	1. If the facility claims that the subpart CC regulations are not applicable to their waste management unit(s) or that the unit(s) are exempt from regulation, explain the rationale for the claim in the comments section.			X
	2. If the waste management unit(s) are exempt because the volatile organic compound (VOC) concentration of the waste is <500 ppmw, does the facility have VOC determination records? (FACILITY MUST HAVE RECORDS.)			X
	3. Does the facility have a written sample and analysis plan for all waste characterization samples?		X	
265.1089.(e)	4. Does the facility have a written plan and schedule to perform air emission control equipment inspections and monitoring?		X	
265.1090(g)	5. Does the facility maintain inspection records on-site for at least three years from the date of the inspection?		X	
265.1085	TANKS			
265.1090(b)	6. If a fixed-roof tank (Tank Level 1 Controls) is used for the storage of a hazardous waste with >500 ppmw VOC, is the maximum vapor pressure determination of the waste maintained in the facility records?			X
265.1085	7. Are all of the tanks for which there is no maximum vapor pressure determination one of the following: fixed roof with internal floating roof, external floating roof, fixed roof vented to a control device, pressure tank, or tank located within an enclosure vented to a control device (Tank Level 2 Controls) ?			X

PART/ SECTION	REGULATION	YES	NO	N/A
	8. Are tank(s) used for waste stabilization located within an enclosure and vented to a combustion device?			X
265.1087	CONTAINERS			
265.1087(b)	9. Are the container (s) (>26 gallons) approved for hazardous waste storage by the U.S. Department of Transportation (DOT)?	X		
	A. If not DOT approved, and the container is <119 gallons, does the container when closed have no visible holes, gaps, or other open spaces into the interior of the container?			X
	B. If not DOT approved, and the container is >119 gallons, is the container in light material service?			X
265.1087(b)	C. If yes, does the container operate with no detectable organic emissions or has the container been demonstrated to be vapor-tight?	X		
265.1087(b)(2)	10. Are any container (s) larger than 26 gallons used for waste stabilization?		X	
265.1087(b)(2)	A. If yes, are the container (s) vented to a control device or located within an enclosure vented to a control device?			X
265.1086	SURFACE IMPOUNDMENTS			
265.1086	11. Does the surface impoundment have either a floating membrane cover or a cover vented to a control device?			X

COMMENTS:

3, 4, & 5. DCDC has made no determination concerning VOC emissions from hazardous waste containers because the containers (Level 1 controls) meet DOT standards. Inspection records for the 90-day accumulation areas meet subpart CC requirements.

9. DCDC manages waste in DOT-approved 55-gallon drums.



C-532-97

COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
Governor

Becky Norton Dunlop
Secretary of Natural Resources

Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193
(703) 583-3800
Fax (703) 583-3801

Thomas L. Hopkins
Director

Gregory L. Clayton
Regional Director

August 29, 1997

Mr. Ray Sullivan
DC Department of Corrections
Industries Division
P.O. Box 730
Lorton, VA 22199

Re: Review of Hazardous Waste Management Training - Initial
DC Department of Corrections Industries Division
VAD980830988

Dear Mr. Sullivan:

Thank you for providing the Department of Environmental Quality (DEQ), Northern Virginia Regional Office (NVRO), a copy of the draft training course outline and attachments for our review. While DEQ does not approve or disapprove such plans, I offer the following comments for your consideration.

General Information.

Throughout the Division Operating Procedure documents, references are made to the Virginia Hazardous Waste Management Regulations (VHWMR) and the Virginia Department of Waste Management (DWM). The VHWMR have been incorporated in the Virginia Administrative Code (VAC), and I have attached a conversion chart for your use. Also, DEQ is the successor agency to DWM.

It may be appropriate for DC Department of Corrections (DCDC) to revise the Division Operating Procedures, 2901 (01/03/94), 2921 (01/03/94), 2912 (10/17/94), and 2920 (02/01/94), to reflect operational changes made since 1994.

Attachment #9. Hazardous Waste Management Training-Initial.

The appropriate term is "satellite accumulation" rather than "satellite storage."

Attachment #10. Hazardous Waste Management Training (Refresher).

Review of initial training program is vague. DCDC could outline areas of additional training; for example, among other things, DCDC could include review of regulations governing satellite accumulation areas for the employees located in the Metal Shop painting area and Furniture Repair Shop stripping room and emergency procedures for all employees.

2901 Hazardous Substance Use and Control Procedure.

Procedures. The plan mentions that the Safety Coordinator shall conduct regularly scheduled briefings on the reading and use of MSDSs. How often will these briefings be conducted? Is training conducted by the Safety Coordinator or Shop/Office Manager? It appears that both employees have similar responsibilities.

2900.1 Hazardous Waste Contingency Plan.

VI. Definitions. The definitions are not consistent with the definitions listed in 9 VAC 20-60-10.

VIII. Procedures. (Telephone Numbers). In accordance with the VHWMR § 6.5.D. (9 VAC 20-60-380) and § 9.3.F (9 VAC 20-60-550), the facility is required to notify DEQ, NVRO, when an emergency occurs. Therefore, it may be appropriate to include the agency's phone number, (703) 583-3800, in the Contingency Plan.

(Hazardous Waste Generation Activities). The appropriate term is "satellite accumulation."

(Emergency Equipment). The VHWMR § 9.3 (VAC 20-60-550) requires that hazardous waste facility contingency plans include "...the location and a physical description of each item on the list [of emergency equipment], and a brief description of each item on the list, and a brief outline of its capabilities." The Contingency Plan appears to lack a description of the item and a brief description of its capabilities.

Mr. Sullivan
DCDC
Page 3

VIII. Training and Records Management. (Training types and amount). Review of initial training program is vague. DCDC could outline areas of additional training; for example, among other things, DCDC could include review of regulations governing the storage of containers in the less than ninety day storage area.

Attachment 2, 3, 4, 5. The facility may want to include the location of emergency equipment on the maps.

Attachment 8. The facility may want to record what specific areas were covered in the training course.

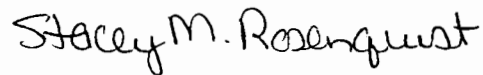
Attachment 9 and 10. Attachment 9, Hazardous Waste Management Training-Initial, and Attachment 10, Hazardous Waste Management Training-Refresher, are blank. DCDC could outline facility specific training; for example, among other things, DCDC could include a review of regulations governing hazardous waste generators, the determination of a hazardous waste and the management of a hazardous waste.

2920 Safety Procedures for Industrial Shops and Offices.

VII. Procedures. (Training). The monthly safety briefing can be included as on-the-job training if documented (i.e., a sign-in sheet and a brief description of topics discussed).

If you have any questions, please call me at (703) 583-3891.

Sincerely,



Stacey M. Rosenquist
Enforcement/Compliance Specialist Senior

Enclosure

cc: Claire Ballard
John Ely
Douglas Washington



1997

C-508-97

COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
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Thomas L. Hopkins
Director

Gregory L. Clayton
Regional Director

August 14, 1997

Mr. Ray Sullivan
DC Department of Corrections
Industrial Division
P.O. Box 730
Lorton, VA 22079

Re: DC Department of Corrections Industrial Division
VAD980830988

Dear Mr. Sullivan:

Thank you for your cooperation during the visit to your facility on August 5, 1997. During the visit, Northern Virginia Regional Office (NVRO) re-evaluated the facility for compliance with the Virginia Hazardous Waste Management Regulations (VHWMR) for those violations previously identified in the January 17, 1997, inspection report.

Based on the visit, the facility has been returned to compliance with the VHWMR for the violations listed below:

1. The accumulation date was not clearly marked and visible for inspection on each container as required by the VHWMR §6.4.E.1.b.
2. Some containers were not labeled or marked clearly with the words "Hazardous Waste" as required by the VHWMR §6.4.E.1.c.

The following violations remain unresolved:

1. Facility personnel have not successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures as required by the VHWMR §6.4.E.1.d. and §9.1.G.1.

2. New employees to the facility have not successfully completed training mentioned above within six months of their employment or assignment to the facility as required by the VHWMR §9.1.G.2.
3. Facility personnel do not participate in an annual review of the initial training as required by the VHWMR §9.1.G.3.
4. The owner/operator does not maintain the following documents or records at the facility as required by the VHWMR §9.1.G.4:
 - a. Job titles for each position at the facility related to hazardous waste management (VHWMR §9.1.G.4.a),
 - b. Name of employee filling each job (VHWMR §9.1.G.4.a),
 - c. A written job description for each position listed in 4.a. above (VHWMR §9.1.G.4.b.),
 - d. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in 4.a. above (VHWMR §9.1.G.4.c), and
 - e. Records that document that the training or job experience required above has been given to, and completed by facility personnel (VHWMR §9.1.G.4.d.).

Since the December 12, 1997, inspection, DC Department of Corrections (DCDC) has failed to conduct any documented hazardous waste training for its employees. The VHWMR require that Large Quantity Generators (LQG) conduct initial training for all employees as well as annual refresher training. Consequently, DCDC, as a LQG, must accomplish this training and all documentation requirements before the facility can be returned to compliance with the VHWMR.

For failure to resolve the outstanding violations in a timely manner, DCDC has been forwarded to our Regional Enforcement Specialist, Douglas Washington, for formal enforcement action.

During the recent visit, NVRO noted that employees in the stripping room had inadvertently placed some hazardous waste (methylene chloride) sponges (F002) in the trash can instead of in the hazardous waste drum. It appears that the satellite accumulation area in that room needs additional attention by the supervisor/hazardous waste coordinator. Also, it was noted that three drums containing unused "reflecto-lite" paint may have been mislabeled as a hazardous waste. According to Ray Sullivan, the paint has been discontinued, and DCDC is returning the paint to the supplier. This suggests that the paint is not a hazardous waste but a hazardous material. It appears that these problems may be a result of inadequate training.

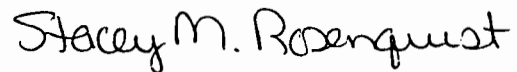
Please take appropriate actions to address the remaining violations, the problems in the satellite accumulation area and the hazardous waste storage area. Provide documentation of your actions to the Department within 15 calendar days of the date of this letter.

Mr. Sullivan
Page 3

During the site visit, you provided a draft copy of the facility's training program outline to NVRO. NVRO will review the plan and provide comments to you by August 29, 1997.

If I can be of any further assistance, please call me at (703) 583-3891.

Sincerely,

A handwritten signature in cursive script that reads "Stacey M. Rosenquist".

Stacey M. Rosenquist
Enforcement/Compliance Specialist Sr.

cc: Claire Ballard
John Ely
Doug Washington



C-156-97

COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
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Thomas L. Hopkins
Director

Becky Norton Dunlop
Secretary of Natural Resources

Gregory L. Clayton
Regional Director

March 20, 1997

Mr. Ray Sullivan
DC Department of Corrections
Industrial Division
P.O. Box 730
Lorton, VA 22079

Re: DC Department of Corrections Industrial Division
VAD980830988

Dear Mr. Sullivan:

Thank you for your cooperation during the visit to your facility on March 10, 1997. During the visit, Northern Virginia Regional Office (NVRO) re-evaluated the facility for compliance with the Virginia Hazardous Waste Management Regulations (VHWMR) for those violations previously identified in the January 17, 1997, inspection report.

Based on the visit and your letter dated March 4, 1997, the facility has been returned to compliance with the VHWMR for the violation listed below:

1. Satellite accumulation areas:
 - a. The containers in the satellite accumulation areas are not in good condition as required by the VHWMR §6.4.E.3.a.(1) and §9.8.B.
 - b. The containers are not kept closed except as necessary to add or remove waste as required by the VHWMR § 6.4.E.3.a.(1) and § 9.8.D.1.
 - c. The containers are not marked with the words "Hazardous Waste" or other words that identify the contents of the container as required by the VHWMR § 6.4.E.3.a.(2).

The following violations remain unresolved:

1. Facility personnel have not successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures as required by the VHWMR §6.4.E.1.d. and §9.1.G.1.
2. New employees to the facility have not successfully completed training mentioned above within six months of their employment or assignment to the facility as required by the VHWMR §9.1.G.2.
3. Facility personnel do not participate in an annual review of the initial training as required by the VHWMR §9.1.G.3.
4. The owner/operator does not maintain the following documents or records at the facility as required by the VHWMR §9.1.G.4:
 - a. Job titles for each position at the facility related to hazardous waste management(VHWMR §9.1.G.4.a.),
 - b. Name of employee filling each job (VHWMR §9.1.G.4.a),
 - c. A written job description for each position listed in 4.a. above (VHWMR §9.1.G.4.b.),
 - d. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in 4.a. above (VHWMR §9.1.G.4.c), and
 - e. Records that document that the training or job experience required above has been given to, and completed by facility personnel (VHWMR §9.1.G.4.d.).
5. The accumulation date was not clearly marked and visible for inspection on each container as required by the VHWMR §6.4.E.1.b.
6. Some containers were not labeled or marked clearly with the words "Hazardous Waste" as required by the VHWMR §6.4.E.1.c.

Please take appropriate action to address the outstanding violations and provide documentation of your actions to the Department within 30 calendar days of the date of this letter.

As requested in the inspection report, you provided a revised draft copy of the facility's Hazardous Waste Management Contingency Plan to NVR0 during the visit. NVR0 has reviewed the plan, and the plan appears to meet the requirements of the VHWMR.

Mr. Sullivan
Page 3

If I can be of any further assistance, please call me at (703)
583-3891.

Sincerely,

Stacey M. Muddiman

Stacey M. Muddiman
Environmental Inspector Senior

cc: John Ely
Claire Ballard



COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
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Becky Norton Dunlop
Secretary of Natural Resources

Northern Virginia Regional Office
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Thomas L. Hopkins
Director

Gregory L. Clayton
Regional Director

MEMORANDUM

To: John Bowden *AM 5-13-97 To Doug*
Regional Compliance and Enforcement Manager

Through: John E. Ely *JE*
Waste Compliance Manager

From: Stacey M. Rosenquist *SMR*
Enforcement/Compliance Specialist, Sr.

Date: May 13, 1997

Re: Referral for Enforcement Action
DC Department of Corrections, Industries Division
VAD980830988

cc: Claire Ballard
Julia King-Collins

I have attached information and correspondence concerning the waste management activities at DC Department of Corrections (DCDC). DEQ, NVRO, inspected the facility on December 12, 1996. During the inspection, Waste Compliance found the facility in violation of the VHWMR and issued DCDC an NOV/inspection report on January 17, 1997. The NOV requested that DCDC take action to resolve the violations and respond by March 3, 1997. NVRO received a response from DCDC on March 4, 1997, and performed a subsequent evaluation of the facility on March 10, 1997. Based on review of the response and the site visit, Waste Compliance was unable to return the facility to compliance with the VHWMR for six of the seven violations. Waste compliance sent a subsequent letter to DCDC on March 20, 1997, requesting the facility to take action to resolve the remaining violations by April 21, 1997. Waste compliance has not received a response from DCDC.



JAN 22 1997
C-034-97

OTA-CB

COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

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Becky Norton Dunlop
Secretary of Natural Resources

Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193
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Thomas L. Hopkins
Director

Gregory L. Clayton
Regional Director

January 17, 1997

Mr. Ray Sullivan
DC Department of Corrections
Industrial Division
P.O. Box 730
Lorton, VA 22079

RE: RCRA Inspection - Notice of Violation
DC Department of Corrections Industrial Division
VAD980830988

Dear Mr. Sullivan:

Thank you for your cooperation during the compliance evaluation inspection conducted at your facility on December 12, 1996, by the Virginia Department of Environmental Quality (DEQ), Northern Virginia Regional Office (NVRO). During this inspection, NVRO evaluated the facility for compliance with the Virginia Hazardous Waste Management Regulations (VHWMR) as a Large Quantity Generator. I have enclosed a completed summary sheet and inspection checklist for your review.

Also, during the inspection, NVRO re-evaluated violations noted during the January 22, 1992, inspection. As a result of this inspection, your facility has been returned to compliance with the VHWMR for those violations listed below:

1. The facility has not notified DEQ of the exact location of existing accumulation areas as required by the VHWMR §6.4.E.1.e, §6.4.E.3.b, and §6.4.E.1.b.
2. The facility did not submit an annual report for the preceding calendar year as required by the VHWMR §6.5.

3. Contingency Plan:

- a. The facility did not have a detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes as required by the VHWMR §9.3.B.1-2.
- b. The facility did not have a description of arrangements agreed to by local police and fire departments, Commonwealth and local emergency response teams, local hospitals, and contractors to coordinate emergency coordinators as required by VHWMR §9.3.B.4.
- c. The facility did not have a listing of names, addresses, office, and home telephone numbers of all persons qualified to act as emergency coordinators as required by the VHWMR §9.3.B.4.
- d. The facility did not have a list of emergency equipment necessary to cope with emergencies at the facility as required by the VHWMR §9.3.B.5.
- e. The facility did not have a list specifying the location and physical description of all emergency equipment and a brief outline of its capabilities as required by the VHWMR §9.3.B.6.
- f. The facility did not have a documented evacuation plan in the event of an emergency as required by the VHWMR §9.3.B.6.
- g. The facility did not submit copies of contingency plan to local police departments, fire departments, hospitals and Commonwealth and local emergency response teams that may be called upon to provide emergency services, and no documentation to indicate that all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams have received the contingency plan as required by the VHWMR §9.3.C.

Nonetheless, based on review of observations, responses, and documents obtained during this inspection, the Department has information indicating that the facility may be in violation of other applicable provisions of the VHWMR. This information is noted on the enclosed inspection checklist and summarized below:

1. Facility personnel have not successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures as required by the VHWMR §6.4.E.1.d. and §9.1.G.1.
2. New employees to the facility have not successfully completed training mentioned above within six months of their employment or assignment to the facility as required by the VHWMR §9.1.G.2.
3. Facility personnel do not participate in an annual review of the initial training as required by the VHWMR §9.1.G.3.
4. The owner/operator does not maintain the following documents or records at the facility as required by the VHWMR §9.1.G.4:
 - a. Job titles for each position at the facility related to hazardous waste management(VHWMR §9.1.G.4.a.),
 - b. Name of employee filling each job (VHWMR §9.1.G.4.a),
 - c. A written job description for each position listed in 4.a. above (VHWMR §9.1.G.4.b.),
 - d. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in 4.a. above (VHWMR §9.1.G.4.c), and
 - e. Records that document that the training or job experience required above has been given to, and completed by facility personnel (VHWMR §9.1.G.4.d.).
5. The accumulation date was not clearly marked and visible for inspection on each container as required by the VHWMR §6.4.E.1.b.
6. Some containers were not labeled or marked clearly with the words "Hazardous Waste" as required by the VHWMR §6.4.E.1.c.

7. Satellite accumulation areas:

- a. The containers in the satellite accumulation areas are not in good condition as required by the VHWMR §6.4.E.3.a.(1) and §9.8.B.
- b. The containers are not kept closed except as necessary to add or remove waste as required by the VHWMR § 6.4.E.3.a.(1) and § 9.8.D.1.
- c. The containers are not marked with the words "Hazardous Waste" or other words that identify the contents of the container as required by the VHWMR § 6.4.E.3.a.(2).

These issues were discussed with you during the inspection. Please advise this office within 10 calendar days if this information is incorrect, if you have taken appropriate action to address these issues, or if there is other information that DEQ should consider.

As we discussed during the inspection, due to operational changes at the facility, please submit to DEQ for review a draft copy of the revised contingency plan. Also, as a result of this inspection, please notify DEQ of your additional hazardous waste satellite areas and storage areas as required by the VHWMR §6.4.E.1.e.

This notice is not an agency proceeding or determination which may be considered a case decision under the Administrative Process Act (Va. Code §§ 9-6.14:1, et seq.).

Please take appropriate action to address the issues noted above and provide documentation of your actions to DEQ within 45 calendar days of the date of this letter.

Again, thank you for your cooperation during the inspection. If you have any questions, please call me at (703) 583-3891.

Sincerely,

Stacey M. Muddiman

Stacey M. Muddiman
Environmental Inspector Senior

Enclosures

cc: Claire Ballard
John Ely
Julia King-Collins

January 1994

DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION

SURVEY SHEET
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

NAME of FACILITY: DC Department of Corrections Industrial Division

ADDRESS: Industrial Division-Central Silverbrook Road Tower Gate 4

EPA ID NUMBER: Lorton, VA 22079-0730

FACILITY REPRESENTATIVE: Raymond Sullivan

TITLE: Industrial Manager

TELEPHONE NUMBER: (703) 643-6332

INSPECTOR'S NAME: Stacey M. Muddiman

TITLE: Environmental Inspector Senior

DATE of INSPECTION: December 12, 1996

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.)

Furniture repair and refinishing

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

D001, F002 - Waste methylene chloride

D001, D035, F003, F005 - Waste paint related material

F001 - 1,1,1 Trichloroethane

3. List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
D001, F002	2 drums(55 gallon)	5 drums(55 gallon)
D001, D035, F003, F005	3 drums(55 gallons)	6 drums(55 gallons)
F001	4 drums(55 gallons)	4 drums(55 gallons)

4. Does the facility ever generate greater than:
1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)?

NO

100 kg of clean-up from a spill of P listed waste or F020-F023 and F026-F027 waste?

NO

If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent? (List all transporters and facilities, or on-site treatment performed).

Transporters-

Freehold Cartage NJD054126164

TSD Facilities-

Petrochem Processing Inc. MID980615298

6. Does the facility generate any hazardous waste that is excluded from regulation?

NO

If yes, list the waste and the basis for exclusion.

7. Does the facility:

Generate

Market

Burn

used oil that is burned for energy recovery? **Underline or circle all that are applicable.** (If the facility **markets** or burns used oil, fill out the **Used Oil Checklist.**)

NO

Does the generator of used oil to be burned for energy recovery (other than a **Conditionally Exempt Small Quantity Generator**) mix the used oil with hazardous waste?

NO

If **YES**, then fill out the **Used Oil Checklist.**

8. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these?

NO

If **Yes**, list the waste, where it is sent, and complete the **Metals Recovery Checklist.**

9. Does the facility generate, transport, store, collect or reclaim spent lead-acid batteries?

NO

If **yes**, Underline or **circle** all that are applicable. If the facility stores batteries before reclaiming them, complete the **Metals Recovery Checklist.**

10. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
- b. small quantity generator
- c. generator
- d. permitted or interim status TSD
- e. unpermitted TSD (explain in comments section)
- f. transporter
- g. other: please explain_____

[Underline or **Circle** All That Are Applicable]

11. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5-55-gallon drums) of non-acute hazardous waste, at which time the accumulation time (180 days or 270 days) for small quantity generators begin.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

12. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]

Location	# of Containers	# of Tanks	Capacity
Storage Area	10 drums	0	55 gallons each
Satellite 1 D001/D035/ F003/F005	1 drum	0	55 gallons
Satellite 2 D001/F002	1 drum	0	55 gallons

13. Comments:

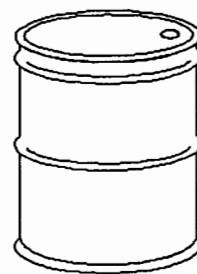
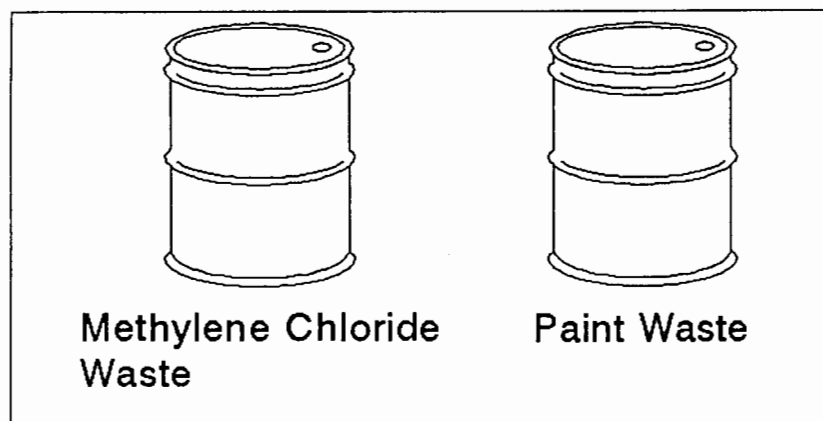
See Checklist.

14. Waste Management Flow Diagram:

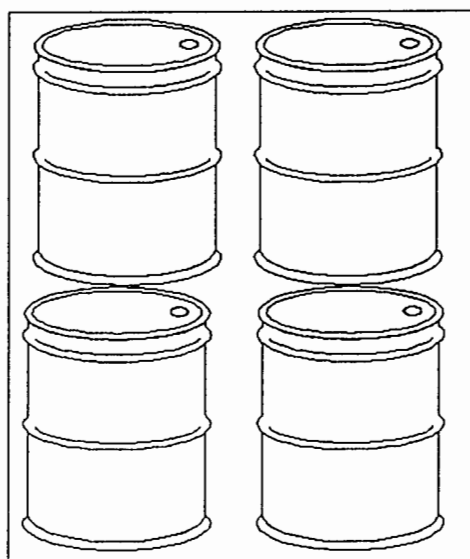
(On this page sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

Figure 1

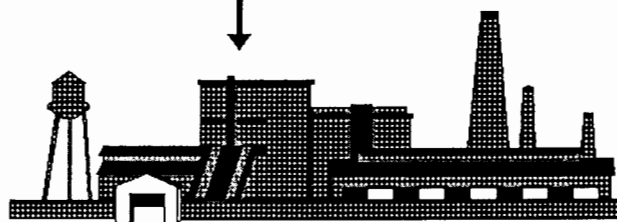
Satellite Accumulation Areas



Methylene Chloride Waste



Storage Accumulation Area



TSD Facility

Figure 1

January 1994

DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF
LARGE QUANTITY GENERATORS (LQG)

FACILITY NAME: DC Department of Corrections Industrial Division

EPA ID NUMBER: VAD980830988

INSPECTION DATE: December 12, 1996

NOTE: * means Non-Compliance

VIRGINIA HAZARDOUS WASTE MANAGEMENT REGULATIONS

PART/ SECTION	REGULATION	YES	NO	N/A
6.3.	1. Is a manifest system currently being used for all hazardous waste shipped off site?	X		
6.2.C.	2. Has the generator determined that the facility has an EPA ID number?	X		
5.5.A.7.	3. Has the generator determined that the transporter has a valid EPA ID number and a valid Virginia Transporter permit?	X		
6.3. 5.3.B.	4. Is the following information on the manifest:			
5.3.B.1.	A. The generator's name, mailing address, EPA ID number, and telephone number?	X		
5.3.B.2.	B. A unique five digit number assigned to the manifest by the generator?	X		
5.3.B.3.	C. The total number of pages of the manifest?	X		
5.3.B.4.	D. The company name and EPA ID number of each transporter used?	X		
5.3.B.5.	E. The company name, site address, and EPA ID number of the facility designated to receive the waste?	X		
5.3.B.6.	F. The U.S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material?	X		
5.3.B.7.	G. The quantities of waste being shipped? and	X		

PART/ SECTION	REGULATION	YES	NO	N/A
5.3.C.	<p>H. The following certification:</p> <p>I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment. OR, If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.</p>	X		
6.5.C.1.b.	5. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago? SEE COMMENTS	X		
6.5.C.1.b.	6. If no, has the generator filed an exception report with the Executive Director?			X
6.5.C.1.b.	7. Does the exception report include:			
6.5.C.1.b. (1)	A. A legible copy of the manifest for which the generator does not have confirmation of the delivery? and			X
6.5.C.1.b. (2)	B. A cover letter explaining the efforts taken to locate the shipment?			X
6.4.E.1.d. 9.1.G.1.	8. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?		*	
9.1.G.2.	9. Have new employees to the facility successfully completed training mentioned above within six months of their employment or assignment to the facility?		*	
9.1.G.3.	10. Do personnel participate in an annual review of the initial training?		*	
9.1.G.4.	11. Does the owner/operator maintain the following documents and records at the facility:			
9.1.G.4.a.	A. Job titles for each position at the facility related to hazardous waste management?		*	
9.1.G.4.a.	B. The name of the employee filling each job?		*	
9.1.G.4.b.	C. A written job description for each position in 11.A. above?		*	
9.1.G.4.c.	D. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in 11.A. above? and,		*	

PART/ SECTION	REGULATION	YES	NO	N/A
9.1.G.4.d.	E. Records that document that the training or job experience required above has been given to, and completed by facility personnel?		*	
6.4.E.1.d. 9.2.B. 9.2.D.	12. At the facility, is the following equipment installed:			
9.2.B.1.	A. An internal communications or alarm system capable of providing immediate emergency instruction to facility personnel if the hazardous waste generation or accumulation areas are threatened by hazardous waste release, fire or explosion?	X		
9.2.B.2.	B. A device (at the scene of hazardous waste generator operations) capable of summoning emergency assistance from Police, Fire Departments, etc.?	X		
9.2.B.3.	C. Portable fire extinguishers, fire control equipment and decontamination equipment? and	X		
9.2.B.4.	D. Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system?	X		
9.2.C.	13. Is the above equipment tested and maintained as necessary to assure proper operation and is a record of the tests and inspections maintained on a log at the facility?	X		
9.2.E.	14. Does the facility have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies?	X		
6.4.E.1.d. 9.1.F.4.	15. Does the generator record inspections of the accumulation area at his facility in an inspection log?	X		
9.2.F.1.	16. Has the facility attempted to arrange agreements with the local authorities such that:			
9.2.F.1.a.	A. The police, fire and emergency response teams are familiar with the layout of the site, the properties of the hazardous waste handled at the site, normal working areas, entrances to roads inside the facility and possible evacuation routes?	X		
9.2.F.1.b.	B. Where more than one police and fire department might respond to an emergency, do agreements specify a primary emergency authority?	X		
9.2.F.1.c.	C. Agreements with Commonwealth emergency response teams, emergency response contractors and equipment suppliers are specified? and	X		
9.2.F.1.d.	D. The local hospital is familiar with the properties of the hazardous wastes handled and the types of injuries or illnesses which could result from fires, explosions, or releases?	X		

PART/ SECTION	REGULATION	YES	NO	N/A
6.4.E.1.d. 9.3.A.1.	17. Does the facility have an established contingency plan to deal with any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, ground water or surface water?	X		
9.3.B.	18. Does the contingency plan contain the following elements:			
9.3.B.(1, 2)	A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, and water?	X		
9.3.B.3.	B. A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors and Commonwealth and local emergency response teams to coordinate emergency services, as required?	X		
9.3.B.4.	C. A listing of names, addresses, and office and home phone numbers of all persons qualified to act as emergency coordinator? List primary Coordinator. NAME: <u>T.R. Ninneman / Hank Stump</u> TITLE: <u>(Furniture Repair Shop / Metal Fabrication Shop) Shop Managers</u> PHONE: Home <u>(Confidential Listing)</u> Office <u>(703) 643-6557/ (703) 643-6898</u>	X		
9.3.B.5.	D. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? Does this list of emergency equipment specify the location and physical description of each item on the list and a brief outline of its capabilities?	X		
9.3.B.6.	E. An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? and	X		
9.3.C.2.	F. Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? *** PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS".	X		
9.3.F.	19. Has the contingency plan ever been implemented?		X	
9.3.F.(9, 10)	20. If yes, was a written report filed with the Director within 15 days and were the Director and other required authorities properly notified before operations resumed?			X
6.5.A.1., 2., & 3.	21. Does the generator retain copies of all manifests, annual reports, exception reports, test results, and waste analysis for at least three years? SEE COMMENTS	X		
6.5.B.1.	22. Has the facility submitted an annual report for the preceding calendar year by March 1?	X		

PART/ SECTION	REGULATION	YES	NO	N/A
6.4.E.7.	23. Does the generator who manages HW prohibited under Part XV treat waste in tanks and containers? If yes, must meet requirements of 6.4.E. and 15.1.G.1.d.		X	
15.1.G.1. d.	24. If the generator treats waste in tanks or containers, has the generator developed a written waste analysis plan and kept on-site in the generator's records. Has the generator filed a plan with director at least 30 days prior to treatment.			X
6.5.D.	25. Has the generator ever submitted a release report if responsible for release of HW which threatens public health. (Must notify NRC, local Government, the Department.)			X
6.4.E.2.	26. Does the generator accumulate (store) hazardous waste in containers or tanks on-site for greater than 90 days? If yes, interim status or a TSD permit is required. (Up to a 30 day extension may be granted by the Director.)		X	
6.4.E.1.e.	27. Has the generator notified the Executive Director by March 1, 1988, of the exact location of the existing container and tank accumulation areas, and at least 15 days prior to use for subsequently established accumulation areas? SEE COMMENTS	X		
6.4.E.1.a. (1) 9.8.	28. The Use and Management of Containers for 90 Day Accumulation Areas:			
6.4.E.1.a 9.8.B.	29. Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation? If No, list the accumulation areas where there are problems and the type of problems. *** PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS".	X		
6.4.E.1.a. 9.8.C.	30. Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?	X		
6.4.E.1.b.	31. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container?		*	
6.4.E.1.c.	32. Is the container labeled or marked clearly with the words "Hazardous Waste".		*	
9.8.D.1.	33. Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste? If No, list the locations where open containers are found. *** PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS."	X		
9.8.E.	34. Are the areas where hazardous waste containers are stored inspected by the owner/operator at least weekly? SEE COMMENTS	X		

PART/ SECTION	REGULATION	YES	NO	N/A
9.8.F.	35. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line?	X		
9.8.G.1.	36. Are incompatible wastes placed in separate containers?	X		
9.8.G.3.	37. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices?	X		
6.4.E.3.a.	38. Does the generator have satellite accumulation areas where up to 55 gal of any one type of HW (1 QT acutely HW) are accumulated? If yes,	X		
6.4.E.3.a.	A. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?	X		
6.4.E.3.a. (1) 9.8.B.	B. Are the containers in good condition?		*	
6.4.E.3.a. (1) 9.8.C.	C. Are the containers compatible with the waste?	X		
6.4.E.3.a. (1) 9.8.D.1.	D. Are the containers kept closed except as necessary to add or remove waste?		*	
6.4.E.3.a. (2)	E. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container? and		*	
6.4.E.3.b.	F. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,		X	
6.4.E.3.b.	1) Has the generator marked the excess amount with the date the excess amount began accumulating?			X
6.4.E.3.b.	2) Has the generator either removed the excess amount within three days of the date of excess accumulations or has he complied with all other provisions for accumulation areas? Namely, has he notified the Executive Director about the location of the accumulation area?			X
	39. PLEASE LIST ANY NEWLY REGULATED WASTE THAT IS NOT LAND RESTRICTED (such as D018-D043, F032, F034 or F035) ON THE LAST PAGE UNDER "COMMENTS".			
15.1.A.2.	40. Does the facility generate, transport, treat, store or dispose any land-restricted wastes? (See VHWMR Part 15) ***	X		
15.1.A.3.	41. Is land disposal of wastes occurring? If yes,		X	

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.A.3. a.	A. Has the facility been granted an extension to the effective date for land restriction applicable to its restricted waste? OR			X
15.1.A.3. b.	B. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? OR			X
15.1.A.3. c.	C. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?			X
15.1.E.	42. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction?		X	
15.1.F.	43. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?		X	
15.1.C.1.	44. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?		X	
15.1.D.1.	45. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)		X	
	46. If yes, does the facility meet the following requirements:			
15.1.D.1. b. 15.1.G. 15.3.C. 15.4. 15.3.	A. Are the residues of the treatment analyzed as specified in VHWMR § 15.1.G. or § 15.3.C. to determine if they meet the applicable treatment standards or VHWMR § 15.4. or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR § 15.3?			X
15.1.D.1. c. 9.10.B.1. 10.10.B.3.	B. Has the owner/operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liner?			X
15.1.D.1. c. 10.5.	C. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR § 10.5?			X

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.D.1. d.	D. Has the owner/operator submitted a written certification to the Executive Director that the requirements of 15.1.D.1.c. have been met which states: "I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted wastes. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment." and			X
15.1.D.1. d.	E. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification?			X
15.1.G.1. a.	47. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?	X		
	48. Did the notification include the following information:			
15.1.G.1. a.(1)	A. EPA Hazardous Waste Number?	X		
15.1.G.1. a.(2)	B. The corresponding treatment standards and all applicable prohibitions set forth in VHWMR § 15.3.C.?	X		
15.1.G.1. a.(3)	C. The manifest number associated with the shipment of waste? and	X		
15.1.G.1. a.(4)	D. Waste analysis data, where available?	X		
15.1.G. 1.b.	49. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR § 15.3.C.?			X
	50. Did the notification include the following information:			
15.1.G.1. b.(1)(a)	A. EPA Hazardous Waste Number?			X
15.1.G.1. b.(1)(b)	B. The corresponding treatment standards and all applicable prohibitions?			X
15.1.G.1. b.(1)(c)	C. The manifest number associated with the shipment of waste? and			X
15.1.G.1. b.(1)(d)	D. Waste analysis date, where available?			X

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.G.1. b.2.	51. Was the certification signed by an authorized representative, and did it state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR § 15.4. and all applicable prohibitions set forth in VHWMR § 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."			X
15.1.G.1. c.	52. Has the generator received a case-by-case exemption on restricted waste, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?			X
15.1.G.1. g.	53. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal? SEE COMMENTS	X		
15.5.	54. Is the generator storing land restricted waste? (For one year storage only)		X	
15.5.1.a.	55. If yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?			X

Comments:

8. - 11. Unable to show that personnel received training and that job descriptions cover hazardous waste duties.

18F. DC Fire Department, Fairfax County Fire Department, DC Metropolitan Police Department, Fairfax County Police Department, Fairfax County Hazardous Materials Unit #34, DC General Hospital, Fort Belvoir Army Medical Hospital, Fairfax County Joint Local Emergency Planning Committee (LEPC), DCDC Fire Marshall, DCDC Environmental Control Officer, DCDC Facility Administer, DCDC Central Switchboard, DCDC Chief Medical Officer, DCDC Director's Office, DCDC Industrial Division's Shop Managers, DCDC Associate Director's Office, DCDC Transport Unit, Virginia Department of Environmental Quality (NVRO)

5. & 21. The generator failed to retain a copy of one manifest, however, the generator has recently obtained a copy of the missing completed manifest.

27. The generator should notify DEO of the location of the satellite accumulation areas and the less than 90 day storage/accumulation area.

31. & 32. Some containers were not labeled or dated in the less than 90 day accumulation/storage area.

38. The generator has two satellite accumulation areas where he failed to characterize the waste streams that are generated at those locations. Satellite Area 1 - The drum containing debris contaminated with methylene chloride was in very poor condition. The drum was missing a lid and label. Satellite Area 2 - The drum containing waste paint was not kept closed.

39. None

40. D001, D035, F002, F003, F005

53. Some Land Disposal Restriction Notifications were not retained, however, the generator has recently obtained copies of the missing LDR's.



Government of the District of Columbia
DEPARTMENT OF CORRECTIONS
Industries Division
P.O. Box 730
Lorton, Virginia 22199

March 4, 1997

RECEIVED
MAR 4 1997

Ms. Stacey M. Muddiman
Commonwealth of Virginia
Department of Environmental Quality
Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193

Northern VA. Region
Dept. of Env. Quality

Dear Ms. Muddiman:

Pursuant to your letter dated January 17, 1997, we have taken steps to abate the shortcomings cited.


The training issue has yet to be finalized. We are working with our Environmental Control Office to formulate and present the initial training for staff involved in Hazard Waste Management and their subsequent annual refresher training.

We are updating our Hazardous Waste Management Contingency Plan and incorporating the training and records management requirements. We have cleaned up and placed signage at satellite waste accumulation sites. Also, our waste containers will be marked with content signs as well as accumulation dates.

Our shipping manifest records will be monitored more closely to assure all required documents are in place, i.e. land disposal records, etc.

Thank you for your assistance.

Sincerely,


Raymond C. Sullivan
Assistant Director

RCS/mla